



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

AVERY T. DAY
ACTING COMMISSIONER

**The Talaria Company, LLC
d/b/a The Hinckley Company, LLC
Hancock County
Trenton, Maine
A-798-77-1-M**

**Departmental
Findings of Fact and Order
Air Emission License
Minor Revision**

After review of the air emission license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

The Talaria Company, LLC d/b/a The Hinckley Company, LLC (Hinckley) has applied for a minor revision to its Air Emission License, permitting the operation of emission sources associated with their boat manufacturing facility located at 40 Industrial Way Trenton, Maine. The minor revision is for the installation of a new spray booth and parts washer.

FACILITY	The Hinckley Company, LLC (Hinckley)
LICENSE TYPE	06-096 CMR 115 Minor Revision
NAICS CODES	3261, 336612
NATURE OF BUSINESS	Composite Boat Fabrication
FACILITY LOCATION	Trenton, Maine

II. APPLICATION CLASSIFICATION

The application submitted by Hinckley does not violate any applicable federal or state requirements, does not reduce monitoring, reporting, testing or record keeping, and does not seek to modify a Best Available Control Technology (BACT) analysis.

The proposed revision will not change the facility's emission limits. Therefore, the amendment is determined to be a minor revision under Minor and Major Source Air Emission License Regulations 06-096 Code of Maine Rules (CMR) 115 (as amended). The procedures found in 06-096 CMR 115 (as amended) can be utilized to process this application since the proposed revision not prohibited by the Part 70 air emission license. This minor revision shall be incorporated into the Part 70 air emission license renewal currently in process.

III. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in 06-096 CMR 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. New Spray Booth and parts washer

Hinckley has requested a minor revision to its air emissions license to install a spray booth for the spraying of varnish on wooden boat parts. The booth will be approximately 364 square feet and 9 feet high and will be equipped with an exhaust plenum with thirty 20" x 20" filter grids consisting of material collector pads for overspray collection. This visible emissions from this unit will be limited to the general process emission limit in 06-096 CMR 101 of 20% on a six minute block average basis.

Currently varnish is applied manually to wooden parts. The booth will allow the facility to apply varnish in a temperature controlled environment using a high velocity low pressure air assisted airless (HVLP AAA) spray gun. Hinckley is considering purchasing two HVLP AAA spray guns (one for backup), however only one gun will be used in the booth at a time. Spraying fine droplets of varnish will allow for the application of a more consistent and refined coat and will eliminate the waste created by manual varnishing. In addition, spray varnishing will eliminate the need to reapply coats that is often required for manual application due to imperfections. The parts washer will be used for cleaning the varnish off the brushes and spray equipment.

The installation of the spray booth and parts washer will not increase the capacity of the facility, nor will actual emissions increase. Since varnish is currently being applied to wooden parts, there will not be a change in chemical usage, aside from normal increases and decreases in usage due to fluctuation related to production. Hinckley is not requesting an increase to any license limits or license allowable

emissions. BACT for the new spray booth equipment includes keeping records of chemical usage based on monthly purchase records. Emissions will be determined based on chemical usage and subsequently included in the currently licensed facility-wide VOC and HAP emission limit calculations.

The Department has determined that this minor revision does not change the licensed allowed or actual emissions from the facility. Therefore, Hinckley may install the spray booth at their Trenton facility as described in this minor revision.

C. Incorporation into the Part 70 Air Emission License

The requirements in this 06-096 CMR 115 New Source Review amendment shall apply to the facility upon amendment issuance. Per *Part 70 Air Emission License Regulations*, 06-096 CMR 140 (as amended), Section 1(C)(8), for a modification that has undergone NSR requirements or been processed through 06-096 CMR 115, the source must then apply for an amendment to the Part 70 license within one year of commencing the proposed operations as provided in 40 CFR Part 70.5.

ORDER

The Department hereby grants Air Emission License Minor Revision A-798-77-1-M pursuant to the preconstruction licensing requirements of 06-096 CMR 115 and subject to the specific conditions below.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

SPECIFIC CONDITIONS

- (1) Hinckley is licensed to install a new spray booth and shall maintain records of chemical usage which will be included in the facility-wide VOC and HAP emission calculations outlined in Air Emissions License A-798-70-B-R. Hinckley shall also keep records of filter maintenance and filter changes for the spray booth.
- (2) Parts washers at Hinckley are subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended).
 - A. Hinckley shall keep records of the amount of solvent added to each parts washer. [06-096 CMR 115, BPT]

- B. The following are exempt from the requirements of 06-096 CMR 130 [06-096 CMR 130]:
1. Solvent cleaners using less than two liters (68 oz) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
 2. Wipe cleaning; and,
 3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.
- C. The following standards apply to cold cleaning machines that are applicable sources under Chapter 130.
1. Hinckley shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 CMR 130]:
 - (i) Waste solvent shall be collected and stored in closed containers.
 - (ii) Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
 - (iii) Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
 - (iv) The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
 - (v) Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the parts washer.
 - (vi) When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.
 - (vii) Spills during solvent transfer shall be cleaned immediately. Sorbent material used to clean spills shall then be immediately stored in covered containers.
 - (viii) Work area fans shall not blow across the opening of the parts washer unit.
 - (ix) The solvent level shall not exceed the fill line.
 2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [06-096 CMR 130]

The Talaria Company, LLC
d/b/a The Hinckley Company, LLC
Hancock County
Trenton, Maine
A-798-77-1-M

5

**Departmental
Findings of Fact and Order
Air Emission License
Minor Revision**

(3) General Process Sources

Visible emissions from any general process source shall not exceed an opacity of 20% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. [06-096 CMR 101]

- (4) Hinckley shall submit an application to incorporate this amendment into the Part 70 air emission license no later than 12 months from commencement of the requested operation. [06-096 CMR 140, Section 1(C)(8)]

DONE AND DATED IN AUGUSTA, MAINE THIS 4 DAY OF December, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Corne for
AVERY T. DAY, ACTING COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: October 19, 2015

Date of application acceptance: November 4, 2015

Date filed with the Board of Environmental Protection:

This Order prepared by Edwin Cousins, Bureau of Air Quality

